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*Midnight Sun PAC*

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P.O. Box 75181 • Washington, D.C. 20013 • (202) 544-6655

February 22, 2000

Federal Election Commission  
Reports Analysis Division  
Attn: Debbie A. Chacona  
999 E Street, NW  
Washington, DC 20463

Identification Number: C00345199

RE: November Monthly Report (10/1/99 – 10/31/99)

Dear Ms. Chacona:

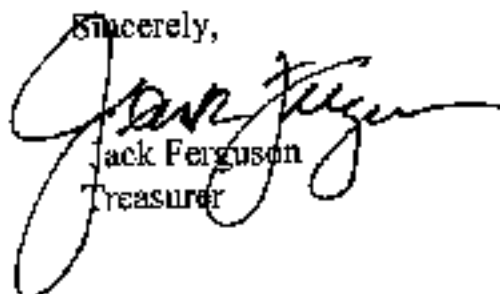
This letter is in response to the FEC notice dated February 9, 2000 which questions disclosure of payments for administrative costs for Midnight Sun Political Action Committee as well as several contributions which exceeded the limits set forth for non-multicandidate political committees.

All of the recipients have been notified in writing of the redesignation of our contributions. Photocopies of these notifications are enclosed. Pursuant to 11 CFR § 110.1 (b), the redesignations will be disclosed as memo entries on Schedule B, supporting line 23 of our March monthly report.

In regard to the payment of administrative expenses, Midnight Sun PAC pays no salaries, only consulting fees, legal fees, and expenditures for consultants traveling on behalf of the committee. In addition, the PAC rents no office space; its business is conducted out of several offices, with costs covered by said consulting and legal fees.

We apologize for any inconvenience this may have caused. Feel free to call me at if you have any questions.

Sincerely,



Jack Ferguson  
Treasurer